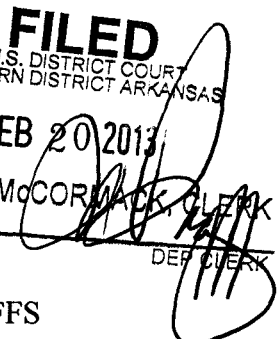


UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF ARKANSAS
WESTERN DIVISION

FILED
U.S. DISTRICT COURT
EASTERN DISTRICT ARKANSAS

FEB 20 2013

JAMES W. McCORMACK, CLERK
By: 
DEP. CLERK

DANIEL R. MARTINEZ and
ALICIA MARTINEZ

PLAINTIFFS

VS.

NO. 4:13cv083 DPM

JEFFERSON PARTNERS LP

DEFENDANT

COMPLAINT

Plaintiffs, for their complaint against defendant, state:

1. Plaintiffs are citizens and residents of Arkansas.
2. Defendant is a limited partnership organized under the laws of Minnesota with its

This case assigned to District Judge Marshall
and to Magistrate Judge Young

principal place of business in Minnesota.

3. The amount in controversy, exclusive of interest and costs, exceeds \$75,000.
4. The events complained of occurred in the Eastern District of Arkansas.
5. On September 3, 2010, plaintiff Daniel Martinez was driving his vehicle westbound on Interstate 30 in Little Rock, Arkansas when a bus owned by the defendant crashed into the rear of his vehicle knocking his vehicle into the vehicle in front of him. Plaintiff Alicia was a passenger in the vehicle driven by plaintiff Daniel Martinez.

6. The bus owned by defendant was operated by Rodrick Steele. Rodrick Steele was an employee or agent of defendant and, at all relevant times, was acting within the course and scope of his employment or agency. Defendant is vicariously liable for conduct of Rodrick Steele.

7. Rodrick Steele was negligent in following too closely, traveling too fast for

existing conditions and in failing to keep a proper lookout. His negligence was the proximate cause of the damages sustained by plaintiffs.

8. As a proximate result of the negligence of Rodrick Steele plaintiffs have sustained damages. Plaintiffs have incurred medical expenses which will continue into the future, have lost wages which will continue into the future, have suffered pain, mental anguish and emotional distress which will continue into the future, have scars and disfigurement and have sustained permanent injuries. The injuries suffered by each plaintiff justify an award in excess of \$75,000.

9. Plaintiffs demand a trial by jury.

WHEREFORE, plaintiffs pray judgment against defendant for an amount in excess of \$75,000 each, for their cost and all other proper relief.

Respectfully submitted,

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BY: 